

Exhibit 24

A.G. v. Northbrook Industries, Inc. d/b/a United Inn and Suites

Page 119

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.G.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05231-JPB

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

Volume II

G.W.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05232-JPB

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

J.G.,

Plaintiff,

Civil Action No.

vs.

1:20-cv-05233-SEG

NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES,
Defendant.

CONTINUED VIDEOTAPED DEPOSITION OF ASHAR ISLAM
May 2, 2023 - 5:10 p.m.
1105 West Peachtree Street, NE
Suite 1000

Atlanta, Georgia

J. David Brown, B-1401

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<p style="text-align: right;">Page 120</p> <p>1 INDEX OF EXHIBITS</p> <p>2</p> <p>3 EXHIBIT DESCRIPTION PAGE</p> <p>4 Exhibit 3 11/14/2017 email from Chief Sumlin to unitedinn4649 attaching Brown Protective Services Proposal for Security Services * 128</p> <p>6 Exhibit 5 8/15, 8/16, and 8/17/2017 email chain between Mr. Shareef and Agent Strickler * 151</p> <p>8 Exhibit 10 10/29/2018 email from Inv. Wade to unitedinn4649 attaching Ex. 9 * 133</p> <p>10 Exhibit 28 text messages between Mr. Islam and Sergeant Weber * 144</p> <p>11 Exhibit 29 human trafficking articles * 147</p> <p>12 * denotes previously marked</p> <p>13</p> <p>14 INDEX TO EXAMINATIONS</p> <p>15 PAGE</p> <p>16 By Mr. Bouchard 124</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 122</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE VIDEOGRAPHER: This will be the video</p> <p>4 deposition of Ashar Islam being taken in the matter</p> <p>5 of A.G. versus Northbrook Industries, Inc. d/b/a</p> <p>6 United Inn and Suites. Today's date is May 2nd,</p> <p>7 2023. The time on the record is 5:09 p.m. My name</p> <p>8 is Brandon Brantley. I'm the videographer.</p> <p>9 Counsel, please introduce yourselves for</p> <p>10 the record after which the court reporter will</p> <p>11 swear in the witness.</p> <p>12 MR. BOUCHARD: Good afternoon. David</p> <p>13 Bouchard on behalf of Plaintiff A.G., G.W., and</p> <p>14 J.G.</p> <p>15 MS. RICHENS: Dana Richens with Smith</p> <p>16 Gambrell and Russell representing Northbrook</p> <p>17 Industries, Inc. in the J.G. matter.</p> <p>18 MR. UNDERRINER: Eric Underriner with</p> <p>19 Hall Booth Smith representing Northbrook Industries</p> <p>20 in the A.G. and G.W. matters.</p> <p>21 ASHAR ISLAM</p> <p>22 having been first duly sworn, was examined and</p> <p>23 testified as follows:</p> <p>24 MR. BOUCHARD: This deposition is being</p> <p>25 taken on behalf of Plaintiff A.G. in Case No.</p>
<p style="text-align: right;">Page 121</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2 On behalf of the Plaintiffs:</p> <p>3 DAVID H. BOUCHARD, ESQ.</p> <p>4 Finch McCranie LLP</p> <p>5 229 Peachtree Street, NE</p> <p>6 Suite 2500</p> <p>7 Atlanta, Georgia 30303</p> <p>8 404.658.9070</p> <p>9</p> <p>10 On behalf of Defendant in the J.G. case:</p> <p>11 DANA RICHENS, ESQ.</p> <p>12 Smith, Gambrell & Russell, LLP</p> <p>13 1105 West Peachtree Street, NE</p> <p>14 Suite 1000</p> <p>15 Atlanta, Georgia 30309</p> <p>16 404.815.3500</p> <p>17 On behalf of Defendant in the A.G. and G.W. cases:</p> <p>18 ERIC UNDERRINER, ESQ.</p> <p>19 Hall Booth Smith, P.C.</p> <p>20 2710 Old Milton Parkway</p> <p>21 Suite 200</p> <p>22 Alpharetta, Georgia 30009</p> <p>23 470.386.6900</p> <p>24</p> <p>25 Also Present:</p> <p>BRANDON BRANTLEY, Videographer</p>	<p style="text-align: right;">Page 123</p> <p>1 1:20-cv-05231. This deposition is also being</p> <p>2 cross-noticed in Case No. 1:20-cv-05232 which is</p> <p>3 G.W.'s lawsuit and in Case No. 1:20-cv-05233 which</p> <p>4 is J.G.'s lawsuit.</p> <p>5 Counsel for the Defendants in all three</p> <p>6 cases are present after receiving reasonable</p> <p>7 notice of the deposition. All objections other</p> <p>8 than to the form of a question or to an issue of</p> <p>9 privilege are preserved. Is that agreeable?</p> <p>10 MS. RICHENS: Yes, it is.</p> <p>11 MR. UNDERRINER: Yes.</p> <p>12 MR. BOUCHARD: And this deposition is</p> <p>13 taken pursuant to properly served deposition</p> <p>14 notices and cross-notices and is taken for all</p> <p>15 purposes permitted under the Federal Rules of Civil</p> <p>16 Procedure and the Georgia Civil Practice Act</p> <p>17 including, but not limited to, preservation of</p> <p>18 testimony and cross-examination. Is that agreed?</p> <p>19 MS. RICHENS: Yes.</p> <p>20 MR. UNDERRINER: Yes.</p> <p>21 MR. BOUCHARD: Mr. Court Reporter, the</p> <p>22 same rule I would ask be applied to this transcript</p> <p>23 as was applied to Mr. Shareef's and to the 30(b)(6)</p> <p>24 for United Inn which is that all references to the</p> <p>25 Plaintiffs by name should be modified in the</p>

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<p style="text-align: right;">Page 124</p> <p>1 transcript to only reference their initials.</p> <p>2 EXAMINATION</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q Mr. Islam, nice to see you again, sir.</p> <p>5 A Yes, sir.</p> <p>6 Q I will refer, sir, to the United Inn and</p> <p>7 Suites, the United Inn, the hotel at various points</p> <p>8 through the deposition today.</p> <p>9 A Okay.</p> <p>10 Q Please understand, sir, unless I tell you</p> <p>11 otherwise, I'm referring to the United Inn and</p> <p>12 Suites at 4649 Memorial Drive.</p> <p>13 A Okay.</p> <p>14 Q Does that make sense?</p> <p>15 A Yes.</p> <p>16 Q I do not think the deposition will take</p> <p>17 very long today, Mr. Islam. I'm going to do my</p> <p>18 best to be as efficient as possible.</p> <p>19 A Okay.</p> <p>20 Q I apologize for keeping you waiting since</p> <p>21 3:00.</p> <p>22 A That's okay.</p> <p>23 Q Sometimes my estimates are off. But we</p> <p>24 got a lot more done with Mr. Shareef, and so there</p> <p>25 will be less for you.</p>	<p style="text-align: right;">Page 126</p> <p>1 A Okay.</p> <p>2 Q Is there any reason you're not in a</p> <p>3 deposition to provide good, complete, and accurate</p> <p>4 testimony today?</p> <p>5 A I'm good.</p> <p>6 Q You're prepared to provide --</p> <p>7 A Yes.</p> <p>8 Q -- testimony?</p> <p>9 And you understand, Mr. Islam, that</p> <p>10 you're testifying in your individual capacity,</p> <p>11 right?</p> <p>12 A Yes, sir.</p> <p>13 Q Based on your personal knowledge and</p> <p>14 experiences at the hotel?</p> <p>15 A Yes.</p> <p>16 Q In your time from 2017 to 2019 at the</p> <p>17 hotel, your title was manager --</p> <p>18 A Yes.</p> <p>19 Q -- is that correct?</p> <p>20 A Uh-huh (affirmative).</p> <p>21 Q Did you have any responsibilities during</p> <p>22 that time period, Mr. Islam, for hiring security at</p> <p>23 the hotel?</p> <p>24 A No.</p> <p>25 Q Did you have any responsibilities for</p>
<p style="text-align: right;">Page 125</p> <p>1 A Okay.</p> <p>2 Q I'm sure you remember the ground rules</p> <p>3 for depositions. There's a court reporter and a</p> <p>4 videographer. They are recording our conversation.</p> <p>5 A Uh-huh (affirmative).</p> <p>6 Q Everything you say and that I say and</p> <p>7 that any of the lawyers say will be captured in a</p> <p>8 record. Do you understand that?</p> <p>9 A Yes, sir.</p> <p>10 Q Please try to wait until I am done with a</p> <p>11 question before giving your answer.</p> <p>12 A Okay.</p> <p>13 Q And I promise I will try to wait to ask a</p> <p>14 new question until you're done with your answer.</p> <p>15 Okay?</p> <p>16 A Okay.</p> <p>17 Q If I ask a question which doesn't make</p> <p>18 sense, which is certainly very likely to happen,</p> <p>19 please let me know and I'll try to rephrase it.</p> <p>20 A Okay.</p> <p>21 Q If you don't understand a question for</p> <p>22 any reason, just let me know.</p> <p>23 A Okay.</p> <p>24 Q If you answer a question, I'm going to</p> <p>25 take that to mean that you understood it.</p>	<p style="text-align: right;">Page 127</p> <p>1 firing security at the hotel?</p> <p>2 A No.</p> <p>3 Q Did you have any responsibilities for</p> <p>4 seeking proposals from other security services</p> <p>5 providers that might provide services at the hotel?</p> <p>6 A Yes. If somebody come and give us some</p> <p>7 kind of like a brochure or something, yeah, just</p> <p>8 pass it on, yeah.</p> <p>9 Q During that time period, that is 2017 to</p> <p>10 2019, do you recall considering any other security</p> <p>11 services providers other than Weber or McClelland?</p> <p>12 A Not to my knowledge, yeah.</p> <p>13 Q In other words, during that time period,</p> <p>14 the security at the hotel was from 10:00 p.m. to</p> <p>15 2:00 a.m. by Sergeant Weber --</p> <p>16 A Weber --</p> <p>17 Q -- or McClelland?</p> <p>18 A Yes.</p> <p>19 Q Is that correct?</p> <p>20 A Yes.</p> <p>21 MS. RICHENS: I'll object to the form of</p> <p>22 the question, please.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q And would Sergeant Weber and McClelland</p> <p>25 work together or was it one would be there and the</p>

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<p style="text-align: right;">Page 128</p> <p>1 other would not be there?</p> <p>2 A One at a time.</p> <p>3 Q One at a time. And they would cover the</p> <p>4 entire seven-day week between the two of them?</p> <p>5 A Yes.</p> <p>6 Q Did you ever want to hire a different</p> <p>7 security services company for the hotel other than</p> <p>8 Sergeant Weber or McClelland?</p> <p>9 A No.</p> <p>10 Q I am showing you Plaintiff's Exhibit 3</p> <p>11 which this is the first exhibit in your deposition,</p> <p>12 Mr. Islam. But for the sake of efficiency and</p> <p>13 simplicity, we're keeping the same numbers of</p> <p>14 exhibits from Mr. Shareef's deposition. So this</p> <p>15 was the third exhibit in Mr. Shareef's deposition,</p> <p>16 so I'm going to call it Plaintiff's Exhibit 3.</p> <p>17 A Uh-huh (affirmative).</p> <p>18 Q And it is Bates stamped NBI 3765 through</p> <p>19 NBI 3774. And it is an email from Chief Sumlin to</p> <p>20 unitedinn4649@Gmail. Do you see that?</p> <p>21 A Yes, I do.</p> <p>22 Q Have you seen this email before,</p> <p>23 Mr. Islam?</p> <p>24 A I don't remember.</p> <p>25 Q You do not remember?</p>	<p style="text-align: right;">Page 130</p> <p>1 people?</p> <p>2 A Yeah, I asked them, yes, what they do.</p> <p>3 And they say they are private security services,</p> <p>4 service company. And sometime I ask them okay,</p> <p>5 what kind of like services they do. They say we</p> <p>6 patrol and check if anything suspicious and they</p> <p>7 can call DeKalb County and they come and solve the</p> <p>8 problem. I say okay. So that's what we are doing</p> <p>9 over here. So the only thing is we're not able to</p> <p>10 go 24/7 outside, but we can watch the camera, and</p> <p>11 whenever we see we call 911 or whatever that</p> <p>12 related person is, yes.</p> <p>13 Q Why did you not move forward with any of</p> <p>14 these security vendors that were dropping off their</p> <p>15 cards?</p> <p>16 A I'm not sure. Because the thing is the</p> <p>17 officer make the decision right away, the officers.</p> <p>18 Because I don't have any experience to work with</p> <p>19 those security company strictly, so that's why I</p> <p>20 don't know their credibility. So myself I rely on</p> <p>21 the officers that the local police, they can come</p> <p>22 right away and solve the issue if we have any</p> <p>23 problems.</p> <p>24 Q If I'm understanding you correctly,</p> <p>25 you're saying you were comfortable calling 911 if</p>
<p style="text-align: right;">Page 129</p> <p>1 A No.</p> <p>2 Q Do you remember seeing this proposal from</p> <p>3 Brown Security Services?</p> <p>4 A I am not exactly sure about this security</p> <p>5 company. But I do see some security company</p> <p>6 proposals, yes.</p> <p>7 Q Is this a proposal that you had seen back</p> <p>8 in 2017 when it was emailed to the hotel or ...</p> <p>9 A I don't recall.</p> <p>10 Q Do you recall ever talking with anybody</p> <p>11 from this security services company, Brown Security</p> <p>12 Services?</p> <p>13 A I'm not exactly sure about this one. But</p> <p>14 I do, yeah, some security people come and introduce</p> <p>15 their company, yes.</p> <p>16 Q Do you remember the names of any of those</p> <p>17 companies, Mr. Islam?</p> <p>18 A No.</p> <p>19 Q And that would have happened sometime</p> <p>20 between 2017 and 2019 do you believe?</p> <p>21 A Maybe, yeah. I'm not sure.</p> <p>22 Q And these are people just coming by and</p> <p>23 dropping business cards?</p> <p>24 A Yes.</p> <p>25 Q Did you ever interview any of these</p>	<p style="text-align: right;">Page 131</p> <p>1 you saw an issue as opposed to having a private</p> <p>2 security company?</p> <p>3 A Yes. I can say I'm confident they can</p> <p>4 come and solve the issue.</p> <p>5 Q Did you ever recommend at any point in</p> <p>6 time that the hotel hire security for the other 20</p> <p>7 hours per day?</p> <p>8 A I just not recommend but sometime yes.</p> <p>9 But now the days, not at that time. But now the</p> <p>10 days whenever we have too much like homeless people</p> <p>11 around, now we really are considering to have some</p> <p>12 people who can do those security things, yeah.</p> <p>13 Q So during that time period 2017 to 2019,</p> <p>14 you did not recommend having private security at</p> <p>15 the hotel --</p> <p>16 A No.</p> <p>17 Q -- 24 hours a day?</p> <p>18 A No.</p> <p>19 Q Was it ever your opinion during that time</p> <p>20 period that there should be more security at the</p> <p>21 hotel?</p> <p>22 A No. Because most of the time we solve</p> <p>23 that problem with the DeKalb County. So I think</p> <p>24 99 percent, so whenever we call they showed up and</p> <p>25 they solve the issue.</p>

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<p style="text-align: right;">Page 132</p> <p>1 Q So if I understand correctly, Plaintiff's</p> <p>2 Exhibit 3 is not a proposal that you remember</p> <p>3 reviewing in 2017, it appears like it is new to</p> <p>4 you?</p> <p>5 A Maybe I saw that but I don't remember the</p> <p>6 exact that company. I saw a couple of proposals.</p> <p>7 Some handout, some on email, yes, I do. But I'm</p> <p>8 not familiar -- I not remember this security</p> <p>9 company name, yeah.</p> <p>10 Q And you are aware that there were</p> <p>11 security companies that provided 24/7 --</p> <p>12 A Yes.</p> <p>13 Q -- security?</p> <p>14 A Yes.</p> <p>15 Q You saw proposals from some of those</p> <p>16 companies?</p> <p>17 A Yeah.</p> <p>18 Q Why did you not select any of those?</p> <p>19 A Because we already have the DeKalb</p> <p>20 County. And as I said, that whenever we have -- we</p> <p>21 are open 24/7 and we just have eyes and ears. Some</p> <p>22 of our housekeepers, some of our maintenance</p> <p>23 people, some of our -- even the tenants whenever</p> <p>24 they let us know, we can call and point out those</p> <p>25 rooms, those issues, those problems. Because we</p>	<p style="text-align: right;">Page 134</p> <p>1 A Yes, it is.</p> <p>2 Q It says: Ashar was advised by her</p> <p>3 guardian that she was staying at United Inn located</p> <p>4 at 4649 Memorial Drive. Thank you for your help.</p> <p>5 Do you see that, sir?</p> <p>6 A Yes, I do see.</p> <p>7 Q And the subject line is Missing Person,</p> <p>8 right?</p> <p>9 A Uh-huh (affirmative).</p> <p>10 Q Is that correct?</p> <p>11 A The subject line is?</p> <p>12 Q The subject line says Missing Person. Do</p> <p>13 you see that?</p> <p>14 A Yes. Sometime, yeah, parents when they</p> <p>15 come, they ask -- they show us picture and they</p> <p>16 show us names. And if we have somebody with this</p> <p>17 name registered, we just let them know, yes.</p> <p>18 Q Right. I'm just asking, you see this --</p> <p>19 A I'm not exactly sure about this --</p> <p>20 Q The subject line on that --</p> <p>21 A Yeah.</p> <p>22 Q -- email --</p> <p>23 A Yeah.</p> <p>24 Q -- it reads Missing Person?</p> <p>25 A Yeah, Missing Person, yes, sir.</p>
<p style="text-align: right;">Page 133</p> <p>1 never close, so somebody was there at the office to</p> <p>2 take care of our -- I can say convey that to the</p> <p>3 DeKalb County.</p> <p>4 Q Convey that to --</p> <p>5 A Just in case if we have any issue, so</p> <p>6 right away can call.</p> <p>7 Q So you're saying tenants, guests at the</p> <p>8 hotel can help; is that what you're saying?</p> <p>9 A Of course, sometimes, yes, they mention</p> <p>10 us. They mention us, so we tell officers also.</p> <p>11 Q I'm handing you what was Plaintiff's</p> <p>12 Exhibit 10 to Mr. Shareef's deposition. This will</p> <p>13 be Plaintiff's Exhibit 10 to your deposition as</p> <p>14 well, Mr. Islam. And it is Bates stamped NBI 3097</p> <p>15 to 3098. You see that, Mr. Islam?</p> <p>16 A Yes, I see that.</p> <p>17 Q Do you see it?</p> <p>18 A Yes.</p> <p>19 Q So that's Plaintiff's Exhibit 10. And</p> <p>20 that email is from an Investigator Tim Wade.</p> <p>21 A Uh-huh (affirmative).</p> <p>22 Q Do you see that with Rockdale County</p> <p>23 Sheriff's Office?</p> <p>24 A Yes, I see.</p> <p>25 Q And it is addressed to you, is it not?</p>	<p style="text-align: right;">Page 135</p> <p>1 Q Right. So you received that email,</p> <p>2 Mr. Islam?</p> <p>3 A Yes. According to that, yes.</p> <p>4 Q I realize as we sit here today it seems</p> <p>5 like you may not remember receiving it, but are you</p> <p>6 disputing that you received it?</p> <p>7 A No, I received that. But I am not</p> <p>8 remember that because it '18. I do receive couple</p> <p>9 of those emails, yes.</p> <p>10 Q As we sit here today, do you remember</p> <p>11 receiving this email?</p> <p>12 A No, I don't remember.</p> <p>13 Q There's an attachment to that email,</p> <p>14 correct?</p> <p>15 A Yes, sir.</p> <p>16 Q And you're holding that --</p> <p>17 A Yeah.</p> <p>18 Q -- it is part of Plaintiff's Exhibit 10.</p> <p>19 A Yeah.</p> <p>20 Q That came with the email, right --</p> <p>21 A Yes.</p> <p>22 Q -- from Investigator Wade. You agree</p> <p>23 with that?</p> <p>24 A Yes, sir.</p> <p>25 Q And the attachment is a notice of missing</p>

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<p style="text-align: right;">Page 136</p> <p>1 person. You see that?</p> <p>2 A Uh-huh (affirmative).</p> <p>3 Q You agree?</p> <p>4 A Yes, sir.</p> <p>5 Q And the attachment has a photo on it,</p> <p>6 correct?</p> <p>7 A Yes.</p> <p>8 Q And it indicates the age, race, gender,</p> <p>9 height, weight of that missing person, correct?</p> <p>10 A Yes.</p> <p>11 Q And the name of --</p> <p>12 A Yes.</p> <p>13 Q -- the missing person too?</p> <p>14 A Yes.</p> <p>15 Q And you see it says J.G., age 16, 5-7?</p> <p>16 A Yeah.</p> <p>17 Q Weight, black, so on and so forth?</p> <p>18 A Uh-huh (affirmative).</p> <p>19 Q Do you remember seeing this notice?</p> <p>20 A I don't recall that. But I do see -- do</p> <p>21 got those messages by email, but I'm not exactly</p> <p>22 remember that specific one.</p> <p>23 Q You do not remember receiving this</p> <p>24 notice?</p> <p>25 A I don't remember, yeah.</p>	<p style="text-align: right;">Page 138</p> <p>1 addressed, yes. But I am not exactly -- I not</p> <p>2 remember that specific one, yeah.</p> <p>3 Q It seems as if he somehow knows you</p> <p>4 because he refers to you personally, he says Ashar?</p> <p>5 A Yeah, maybe he come often and talk to me,</p> <p>6 yes, yes.</p> <p>7 Q But you do not recall --</p> <p>8 A I don't recall, yes, sir.</p> <p>9 Q Do you remember anybody else at the</p> <p>10 hotel, whether it was Mr. Shareef or somebody else,</p> <p>11 talking with an Investigator Wade about J.G.?</p> <p>12 A I'm not sure.</p> <p>13 Q Mr. Islam, I take it the answer is no,</p> <p>14 but did you hold a staff meeting and talk about</p> <p>15 this notice that you had received?</p> <p>16 A Not exactly the staff meeting. Actually</p> <p>17 whenever somebody come after my shift, I discuss</p> <p>18 with them, okay, there's some things -- there's</p> <p>19 somebody left that and this is behind the counter.</p> <p>20 If you see anybody like that or if you see anybody</p> <p>21 under this name, so there's a number underneath,</p> <p>22 you can call them or let me know if you see any</p> <p>23 kind of information regarding that person, yes.</p> <p>24 Q So when you finish your shift, you would</p> <p>25 provide a notice like that to whoever was taking</p>
<p style="text-align: right;">Page 137</p> <p>1 Q Again, you're not disputing that you did</p> <p>2 receive it?</p> <p>3 A No, I'm not disputing it.</p> <p>4 Q You're just saying I don't --</p> <p>5 A I don't --</p> <p>6 Q -- remember receiving it?</p> <p>7 A -- remember.</p> <p>8 Q Then I assume -- but tell me if I'm</p> <p>9 wrong -- I assume that you do not remember what you</p> <p>10 did after receiving this; is that correct?</p> <p>11 A Maybe when I received that I just check</p> <p>12 those that tenant list and -- yes. But I don't</p> <p>13 remember what respond I did at that time, yeah.</p> <p>14 Q You do not remember what you did in</p> <p>15 response --</p> <p>16 A Yeah.</p> <p>17 Q -- to that notice, correct?</p> <p>18 A Yeah.</p> <p>19 Q Do you remember communicating with</p> <p>20 Investigator Wade?</p> <p>21 A No, I don't remember.</p> <p>22 Q Do you remember him visiting the hotel?</p> <p>23 A Not exactly that one. But there is like</p> <p>24 a couple of investigator and officers come and talk</p> <p>25 to me, and I tell them whatever need to be</p>	<p style="text-align: right;">Page 139</p> <p>1 over at the front desk?</p> <p>2 A Yeah. If we have like hard copies, yes.</p> <p>3 Usually we just put in the back of our office so</p> <p>4 the customer don't see directly, but our office</p> <p>5 staff can see those persons so they can let us</p> <p>6 know, maybe the housekeepers or maintenance or</p> <p>7 whoever. That's the only people who able to see</p> <p>8 that picture, not the customers.</p> <p>9 Q But if I'm understanding correctly, you</p> <p>10 wouldn't have a staff meeting where you call</p> <p>11 everybody in and you say okay, I want everybody to</p> <p>12 be aware that we just received an email from this</p> <p>13 investigator in Rockdale County about a missing</p> <p>14 16-year-old girl suspected to be at our hotel, here</p> <p>15 is her photo, I want everybody to be looking for</p> <p>16 this girl. If you see her, please immediately</p> <p>17 alert me.</p> <p>18 A Yeah, basically --</p> <p>19 Q Did any meeting like that happen?</p> <p>20 MR. UNDERRINER: Object to form.</p> <p>21 A No, not like meeting, meeting. But we</p> <p>22 put that -- whenever we put those flyer on that</p> <p>23 wall, it means does everybody have to -- they</p> <p>24 already know what to do if that's what we discuss,</p> <p>25 not specifically for that person, but whenever we</p>

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<p style="text-align: right;">Page 140</p> <p>1 got any kind of notice like that, so we put on that 2 wall so everybody knows what is -- why this is 3 there. 4 Q Describe the wall to me. What's hanging 5 on the wall? 6 A Well, basically this is behind the 7 office. So there's like where we punch our 8 timecards, so that's the wall where we have -- 9 where we put all those kind of like notices or 10 anything need to be addressed to anybody -- to 11 everybody, we just put that over there so whenever 12 anybody come, any person punch a time card will see 13 those notices. And if they have any question, they 14 talk to me or whoever is on the shift. 15 Q How many items would you say are hanging 16 on the wall? 17 A Mostly those missing persons paperwork 18 and sometime we have some like wanted pictures from 19 the DeKalb County or the other counties also and 20 anything what we want to tell those -- our 21 employees or like our co-workers so we can make a 22 copy of the IDs and put it there just in case 23 somebody see that person, that person damage 24 anything or that person is not allowed on this 25 property like a DNR list thing, yes.</p>	<p style="text-align: right;">Page 142</p> <p>1 I think that's what we would have done but I'm not 2 sure? 3 A Yeah, I'm not sure. 4 Q You don't have a specific memory of 5 putting it on the wall? 6 A Exactly this one, yeah. But we put those 7 over there, yeah. 8 Q I would have been surprised if you had a 9 specific memory of putting it on the wall. 10 A Yeah. 11 Q It sounds, if I'm hearing your testimony, 12 that you have gotten missing persons reports 13 before? 14 A Yes, sir. 15 Q Is it common in your experience for those 16 reports to concern minors or is that uncommon? 17 MR. UNDERRINER: Object to form. 18 A What your exact question is? 19 BY MR. BOUCHARD: 20 Q Do the missing persons reports that you 21 have seen since you have worked at United Inn and 22 Suites typically concern minors? 23 A Minors? 24 Q People under the age of 18. 25 A Sometime I suppose so, yeah.</p>
<p style="text-align: right;">Page 141</p> <p>1 Q So are there two or three pictures on the 2 wall or is it a wall with -- 3 A Wall with -- 4 Q -- many pictures? 5 A Wall with I can say more than two, three, 6 four pictures. 7 Q More than ten? 8 A Yes. If you talking about the driving 9 license, driving licenses, yes, more than ten, 10 yeah. 11 Q More than 20? 12 A Maybe 20, yeah. 13 Q So 20 photos on the wall? 14 A Yes, sir. Yes, sir. I'm talking about 15 the driving license. 16 Q Well, I'm talking about the wall that 17 you're saying -- 18 A Yes. 19 Q -- this photo would have been put on. 20 A Yeah, this photo -- 21 Q There would have been about 20 or more 22 photos on that wall? 23 A Yes. Yes. 24 Q And are you sure that this notice was put 25 on that wall or are you saying maybe it was because</p>	<p style="text-align: right;">Page 143</p> <p>1 Q Is it 50/50? Is it more common that 2 they're adults? 3 MR. UNDERRINER: Object to the form. 4 A I am not exactly sure 50/50. But there 5 are sometime the elderly person also and the kids 6 also, yes. 7 BY MR. BOUCHARD: 8 Q They can come in all ages? 9 A Yes. 10 Q I didn't know -- 11 A Missing -- missing person, yes. 12 Q I didn't know if one was more common than 13 another. I would think for example, Mr. Shareef, 14 that a missing child might be less common than a 15 missing adult because adults have cars and means of 16 getting away and other things that kids often 17 don't. 18 A Mostly -- 19 MR. UNDERRINER: Object to the form, 20 there's no question pending. 21 A Mostly I can say youngsters I can say. 22 BY MR. BOUCHARD: 23 Q Most of the missing persons reports that 24 you have seen generally concern younger people? 25 A Younger people, yeah.</p>


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<p style="text-align: right;">Page 144</p> <p>1 Q Showing you Plaintiff's Exhibit 28 which</p> <p>2 is Bates stamped NBI 4105 to 4110. And Mr. Islam,</p> <p>3 these are text messages I believe them to be</p> <p>4 between you and Sergeant Weber. Have you had a</p> <p>5 chance to review that, sir?</p> <p>6 A That's the only message, right?</p> <p>7 Q Well, that's really I'm not even going to</p> <p>8 ask you about the substance --</p> <p>9 A Yeah.</p> <p>10 Q -- of any of the messages. My question</p> <p>11 really is is that all of the messages between you</p> <p>12 and Sergeant Weber from 2017 to 2019?</p> <p>13 A I'm not sure. May be some more. I'm not</p> <p>14 exactly sure.</p> <p>15 Q Well, it looks like -- I don't have the</p> <p>16 document in front of me -- but it look like three</p> <p>17 or four or five text messages between you and</p> <p>18 Sergeant Weber from the year 2017 to 2019; is that</p> <p>19 correct?</p> <p>20 A Uh-huh (affirmative).</p> <p>21 Q Does that seem accurate to you? Does</p> <p>22 that surprise you?</p> <p>23 A No. Maybe usually I actually call him</p> <p>24 and I leave actually message or maybe I think he's</p> <p>25 sleeping or maybe he get up from the job and then I</p>	<p style="text-align: right;">Page 146</p> <p>1 at 2:00 a.m., you typically didn't work the</p> <p>2 overnight shift --</p> <p>3 A Yeah, they let --</p> <p>4 Q -- if I understood you?</p> <p>5 A Yeah, they let the night --</p> <p>6 Q Hold on. Sorry. Let me --</p> <p>7 A I'm sorry.</p> <p>8 Q If I understood your testimony in</p> <p>9 February, you typically didn't work the overnight</p> <p>10 shift; is that correct?</p> <p>11 A I did some work nighttime also but not</p> <p>12 every night.</p> <p>13 Q Was it typical for you to work the</p> <p>14 10:00 p.m. to 6:00 a.m. shift from 2017 to 2019?</p> <p>15 A Yeah, in the morning, yes.</p> <p>16 Q It was typical to work 10:00 p.m. to</p> <p>17 6:00 a.m.?</p> <p>18 A Yes, in the morning, morning time I work.</p> <p>19 But whenever somebody don't showed up, I working</p> <p>20 night also.</p> <p>21 Q And they would call you during their</p> <p>22 shift or after their shift --</p> <p>23 A Yes.</p> <p>24 Q -- to report?</p> <p>25 A To report?</p>
<p style="text-align: right;">Page 145</p> <p>1 message him. Otherwise I just call him and tell</p> <p>2 him whatever the problem is or if he can guide me</p> <p>3 or I can call 911 and then I can talk to Weber</p> <p>4 that's what happened yesterday and I call and I can</p> <p>5 check whatever the situation is now, yeah.</p> <p>6 Q So would it be common for you to send</p> <p>7 text messages to Sergeant McClelland?</p> <p>8 MR. UNDERRINER: Object to the form.</p> <p>9 A No. I usually most of the time if I</p> <p>10 text, I text Mr. Weber. Rarely send messages to</p> <p>11 Mr. McClelland. I just call.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q Did you text officer McClelland?</p> <p>14 A Maybe one or two times. I'm not exactly</p> <p>15 sure.</p> <p>16 Q Generally speaking you would call them?</p> <p>17 A Call them.</p> <p>18 Q You would not text them?</p> <p>19 A Yeah. Most of the time, yeah.</p> <p>20 Q And they would not submit written reports</p> <p>21 to you of what had happened during their four-hour</p> <p>22 shifts, correct?</p> <p>23 A No. They like submit like a physical</p> <p>24 report, no.</p> <p>25 Q And if they're clocking out so to speak</p>	<p style="text-align: right;">Page 147</p> <p>1 Q To report what they had seen at the</p> <p>2 property.</p> <p>3 A Yeah. Whenever I go back to that -- to</p> <p>4 the office, so whoever working nighttime, so they</p> <p>5 tell us or they tell me, yeah, what happened last</p> <p>6 night and what I did.</p> <p>7 Q And I meant to ask you a few more</p> <p>8 questions about the missing person report for J.G.,</p> <p>9 Mr. Islam. You said you weren't sure if you posted</p> <p>10 the photo of J.G. on the wall that you were</p> <p>11 describing. Do you recall taking any steps at all</p> <p>12 in response to receiving that notice?</p> <p>13 A I don't recall the specific that one.</p> <p>14 Q But there's no email that I have seen</p> <p>15 where you respond to Investigator Wade. You don't</p> <p>16 recall responding to him, do you?</p> <p>17 MR. UNDERRINER: Object to form.</p> <p>18 A I'm not sure.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q If there were an email, I assume it would</p> <p>21 have been produced; is that correct?</p> <p>22 A Maybe. But I'm not sure about responding</p> <p>23 to him.</p> <p>24 Q Take a look at Plaintiff's Exhibit 29</p> <p>25 which is NBI 625 to 631. Have you seen this</p>

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<p style="text-align: right;">Page 148</p> <p>1 document before, Mr. Islam?</p> <p>2 A Yes, I think I read that before. I'm not</p> <p>3 exactly sure about this whole thing. But some of</p> <p>4 them I saw before, those paperwork. Just they kind</p> <p>5 of understanding what the human trafficking is and</p> <p>6 what we have to do, yeah.</p> <p>7 Q Do you know where you saw it?</p> <p>8 A In the office, yeah.</p> <p>9 Q Where?</p> <p>10 A My office.</p> <p>11 Q Where in your office though?</p> <p>12 A In the back office, yeah.</p> <p>13 Q Can you describe that for me, sir, where</p> <p>14 in the back office? In a filing cabinet? On your</p> <p>15 desk? On a computer?</p> <p>16 A A table also, in the back office on the</p> <p>17 table. Yeah.</p> <p>18 Q On a table in the back office?</p> <p>19 A Back office, uh-huh (affirmative).</p> <p>20 Q What was the purpose of the table?</p> <p>21 A It was a table so we know what is those</p> <p>22 type of like awareness about anything. Like</p> <p>23 sometime our system, how we operate the system and</p> <p>24 what is the new like training material, something</p> <p>25 like that.</p>	<p style="text-align: right;">Page 150</p> <p>1 Q You have not personally distributed this</p> <p>2 to the staff; is that correct?</p> <p>3 A To the staff, not the whole staff, no.</p> <p>4 Q Did you play -- go ahead, sir.</p> <p>5 A Not just distributing that hard copies,</p> <p>6 but we just discuss with the other co-workers like</p> <p>7 this kind of things are going on so just keep an</p> <p>8 eye on that. If you see somebody like those</p> <p>9 things, whatever, is I read on that training</p> <p>10 material, yeah. Training material, whatever the</p> <p>11 newsletter thing sometimes, yeah.</p> <p>12 Q I don't know what you're talking about.</p> <p>13 What is the newsletter thing?</p> <p>14 A Newsletter sometimes like on the news, we</p> <p>15 have some like a new -- like that kind of like</p> <p>16 crimes are going on in that area, so we have to</p> <p>17 aware of that. Or sometime the DeKalb County like</p> <p>18 motels, they discuss with each other that this</p> <p>19 group is like they are robbing people and they are</p> <p>20 doing something bad, so we tell the other</p> <p>21 co-workers to keep an eye on them, don't let</p> <p>22 anybody do this and these are some of the IDs are</p> <p>23 there, so don't check them in.</p> <p>24 Q Did you play any role in preparing this</p> <p>25 document, Mr. Islam?</p>
<p style="text-align: right;">Page 149</p> <p>1 Q Can you describe the table for me,</p> <p>2 Mr. Islam. Is it a table with a stack of paper on</p> <p>3 it?</p> <p>4 A Yeah, it --</p> <p>5 Q Is it a table with one document on it</p> <p>6 that says about human trafficking? What is the</p> <p>7 table?</p> <p>8 A No, that's like a regular table where we</p> <p>9 put all the mails and stuff and so me and the other</p> <p>10 co-worker can see and read that if you have any</p> <p>11 kind of like information like that. Yeah.</p> <p>12 Q How many documents are on the table?</p> <p>13 A Some mails.</p> <p>14 Q Some bills?</p> <p>15 A Mails. Mail, daily mail. Daily mail in</p> <p>16 one shelf and we have like table like shelf on top</p> <p>17 of that.</p> <p>18 Q So it is just sort of like a cubby system</p> <p>19 or shelf system?</p> <p>20 A Yeah.</p> <p>21 Q And it would be on one of the shelves, is</p> <p>22 that what you're saying?</p> <p>23 A Yeah, on the shelf and maybe we have that</p> <p>24 in a cabinet also, the file cabinet where we put</p> <p>25 all those like training material.</p>	<p style="text-align: right;">Page 151</p> <p>1 A No.</p> <p>2 Q Do you know where these materials came</p> <p>3 from?</p> <p>4 A Maybe some training company or maybe</p> <p>5 Mr. Shareef.</p> <p>6 Q I'm not asking to you speculate. I'm</p> <p>7 just asking if you know. Do you know where they</p> <p>8 came from?</p> <p>9 A No, not exactly.</p> <p>10 Q Showing you Plaintiff's Exhibit 5 which</p> <p>11 is Bates stamped NBI 2554 to 2555. It is an email</p> <p>12 chain with FBI Agent K.J. Strickland. It looks</p> <p>13 like it is primarily between Mr. Shareef and Agent</p> <p>14 Strickland. But I believe it is to the United Inn</p> <p>15 Gmail account and I'm not sure who may review that</p> <p>16 account. Do you and Mr. Shareef both have access</p> <p>17 to the United Inn Gmail account?</p> <p>18 A Yes.</p> <p>19 Q Is it your routine practice 2017 through</p> <p>20 2019 to review emails in that account?</p> <p>21 A Yes. Yes, I do. But sometimes I miss</p> <p>22 those, yeah.</p> <p>23 Q Understood. But was it your typical</p> <p>24 practice to review emails in that account during</p> <p>25 those years?</p>

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<p style="text-align: right;">Page 152</p> <p>1 A Yes, sometime, yeah.</p> <p>2 Q Do you recall talking to, communicating</p> <p>3 with, or meeting FBI Agent Strickland?</p> <p>4 A I don't remember.</p> <p>5 Q You said you do not remember?</p> <p>6 A I don't remember.</p> <p>7 MR. BOUCHARD: We can go off the record.</p> <p>8 THE VIDEOGRAPHER: Off the record at</p> <p>9 5:49 p.m.</p> <p>10 (Recess 5:49-5:57 p.m.)</p> <p>11 THE VIDEOGRAPHER: Back on the record at</p> <p>12 5:57 p.m.</p> <p>13 MR. BOUCHARD: Mr. Islam, thank you.</p> <p>14 That concludes my questioning.</p> <p>15 THE WITNESS: Thank you, sir.</p> <p>16 THE VIDEOGRAPHER: Off the record at</p> <p>17 5:57 p.m.</p> <p>18 (Deposition concluded at 6:00 p.m.)</p> <p>19 (Signature reserved)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 154</p> <p>1 - Password-Protected Access: Transcripts and</p> <p>exhibits relating to this proceeding will be</p> <p>2 uploaded to a password-protected repository, to</p> <p>which all ordering parties will have access.</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 153</p> <p>1 The following reporter and firm disclosures</p> <p>were presented by me at this proceeding for review</p> <p>2 by counsel:</p> <p>3 REPORTER DISCLOSURES</p> <p>4 The following representations and disclosures</p> <p>are made in compliance with Georgia Law, more</p> <p>5 specifically:</p> <p>Article 10 (B) of the Rules and Regulations of</p> <p>6 the Board of Court Reporting (disclosure forms)</p> <p>OCGA Section 9-11-28 (c) (disqualification of</p> <p>7 reporter for financial interest)</p> <p>OCGA Sections 15-14-37 (a) and (b)</p> <p>8 (prohibitions against contracts except on a</p> <p>case-by-case basis).</p> <p>9</p> <p>- I am a certified court reporter in the State of</p> <p>10 Georgia.</p> <p>- I am a subcontractor for Veritext Legal</p> <p>11 Solutions.</p> <p>- I have been assigned to make a complete and</p> <p>12 accurate record of these proceedings.</p> <p>- I have no relationship of interest in the matter</p> <p>13 on which I am about to report which would</p> <p>disqualify me from making a verbatim record or</p> <p>14 maintaining my obligation of impartiality in</p> <p>compliance with the Code of Professional Ethics.</p> <p>15 - I have no direct contract with any party in this</p> <p>action, and my compensation is determined solely by</p> <p>16 the terms of my subcontractor agreement.</p> <p>17 FIRM DISCLOSURES</p> <p>18 - Veritext Legal Solutions was contacted to provide</p> <p>reporting services by the noticing or taking</p> <p>19 attorney in this matter.</p> <p>- There is no agreement in place that is prohibited</p> <p>20 by OCGA 15-14-37 (a) and (b). Any case-specific</p> <p>discounts are automatically applied to all parties,</p> <p>21 at such time as any party receives a discount.</p> <p>- Transcripts: The transcript of this proceeding</p> <p>22 as produced will be a true, correct, and complete</p> <p>record of the colloquies, questions, and answers as</p> <p>23 submitted by the certified court reporter.</p> <p>- Exhibits: No changes will be made to the</p> <p>24 exhibits as submitted by the reporter, attorneys,</p> <p>or witnesses.</p> <p>25</p>	<p style="text-align: right;">Page 155</p> <p>1 CERTIFICATE</p> <p>2 STATE OF GEORGIA:</p> <p>COUNTY OF FULTON:</p> <p>3</p> <p>4 I hereby certify that the foregoing transcript</p> <p>was taken down to the best of my ability, as stated</p> <p>5 in the caption, and the colloquies, questions and</p> <p>answers were reduced to typewriting under my</p> <p>6 direction; that the transcript is a true and</p> <p>correct record of the evidence given upon said</p> <p>7 proceeding.</p> <p>I further certify that I am not a relative or</p> <p>8 employee or attorney of any party, nor am I</p> <p>financially interested in the outcome of this</p> <p>9 action.</p> <p>I have no relationship of interest in this</p> <p>10 matter which would disqualify me from maintaining</p> <p>my obligation of impartiality in compliance with</p> <p>11 the Code of Professional Ethics.</p> <p>I have no direct contract with any party in</p> <p>12 this action and my compensation is based solely on</p> <p>the terms of my subcontractor agreement.</p> <p>13 Nothing in the arrangements made for this</p> <p>proceeding impacts my absolute commitment to serve</p> <p>14 all parties as an impartial officer of the court.</p> <p>15</p> <p>This the 12th day of May 2023.</p> <p>16</p> <p>17</p> <p>18  D. BROWN, COR-B-1401</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 DEPOSITION ERRATA SHEET</p> <p>2 To: Dana Richens, Esq., drichens@sgrlaw.com</p> <p>3 Re: Signature of Deponent: Ashar Islam</p> <p>4 Date Errata due back at our offices: 30 Days</p> <p>5</p> <p>6 Greetings:</p> <p>7</p> <p>8 This deposition has been requested for read and sign by the deponent. It is the deponent's</p> <p>9 responsibility to review the transcript, noting any changes or corrections on the attached PDF Errata.</p> <p>10 The deponent may fill out the Errata electronically or print and fill out manually.</p> <p>11</p> <p>12</p> <p>13 Once the Errata is signed by the deponent and notarized, please email it to the offices of Veritext (below).</p> <p>14</p> <p>15</p> <p>16 When the signed Errata is returned to us, we will seal and forward to the taking attorney to file with the original transcript. We will also send</p> <p>17 copies of the Errata to all ordering parties.</p> <p>18</p> <p>19 If the signed Errata is not returned within the time above, the original transcript may be filed</p> <p>20 with the court without the signature of the deponent.</p> <p>21</p> <p>22</p> <p>23 Please send completed Errata to:</p> <p>24 Veritext Production Facility</p> <p>25 20 Mansell Court, Suite 300</p> <p>Roswell, GA 30076</p> <p>(770) 343-9696</p> <p>cs-southeast@veritext.com</p>	<p>1 Page ____ Line ____ Change _____</p> <p>2 _____</p> <p>3 Reason for change:</p> <p>4 Page ____ Line ____ Change _____</p> <p>5 _____</p> <p>6 Reason for change:</p> <p>7 Page ____ Line ____ Change _____</p> <p>8 _____</p> <p>9 Reason for change:</p> <p>10 Page ____ Line ____ Change _____</p> <p>11 _____</p> <p>12 Reason for change:</p> <p>13 Page ____ Line ____ Change _____</p> <p>14 _____</p> <p>15 Reason for change:</p> <p>16 Page ____ Line ____ Change _____</p> <p>17 _____</p> <p>18 Reason for change:</p> <p>19 _____</p> <p>20 Deponent's Signature</p> <p>21 Sworn to and subscribed before me this ____ day of _____, _____.</p> <p>22 _____</p> <p>23 _____</p> <p>24 Notary Public</p> <p>25 My Commission Expires: _____</p>
<p>1 ERRATA for ASSIGNMENT: ATL 5897010</p> <p>2 I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that:</p> <p>3</p> <p>4 ____ There are no changes noted.</p> <p>5</p> <p>6 ____ The following changes are noted:</p> <p>7 Pursuant to Rule 30(7)(e) of the Federal Rules of Civil Procedure and/or OCGA 9-11-30(e), any changes</p> <p>8 in form or substance which you desire to make to your testimony shall be entered upon the deposition</p> <p>9 with a statement of the reasons given for making them. To assist you in making any such</p> <p>10 corrections, please use the form below. If additional pages are necessary, please furnish same and attach.</p> <p>11</p> <p>12 Page ____ Line ____ Change _____</p> <p>13 _____</p> <p>14 Reason for change:</p> <p>15 Page ____ Line ____ Change _____</p> <p>16 _____</p> <p>17 Reason for change:</p> <p>18 Page ____ Line ____ Change _____</p> <p>19 _____</p> <p>20 Reason for change:</p> <p>21 Page ____ Line ____ Change _____</p> <p>22 _____</p> <p>23 Reason for change:</p> <p>24</p> <p>25</p>	

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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